



FW035820 3402.00

CIVIL ACTION NO.

**4-21 CV-187-0**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

NAKISHA JACKSON,

PLAINTIFF

v.

TARRANT COUNTY CORRECTIONS CENTER, ET AL.

DEFENDANT

**CERTIFICATE OF SERVICE**

I certify under penalty of perjury that the foregoing is true and correct. I am REQUESTING COURT MARSHAL SERVICE OF SUMMONS AND COMPLAINT to the entities listed as the defendants and those named as the actors on behalf of the entity at those service locations. Deposit for service enclosed. I do not consent to a magistrate.

  
NaKisha Jackson 02/23/2021

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

NAKISHA JACKSON

**DEFENDANTS**

TARRANT COUNTY CORRECTIONS; ET AL

**(b) County of Residence of First Listed Plaintiff**

(EXCEPT IN U.S. PLAINTIFF CASES)

TARRANT

**(c) Attorneys (Firm Name, Address, and Telephone Number)**

N/A

**County of Residence of First Listed Defendant**

(IN U.S. PLAINTIFF CASES ONLY)

TARRANT

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only) 1 U.S. Government Plaintiff 3 Federal Question  
(U.S. Government Not a Party) 2 U.S. Government Defendant 4 Diversity  
(Indicate Citizenship of Parties in Item III)**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF	PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4 <input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5 <input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6 <input type="checkbox"/> 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FEDERAL JURISDICTION	STATE JURISDICTION
<input type="checkbox"/> 110 Insurance	<b>PERSONAL INJURY</b>	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability		
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander		
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability		
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine		
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability		
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle		
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability		
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury		
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice		
<input type="checkbox"/> 196 Franchise			
	<b>PERSONAL PROPERTY</b>	<b>LABOR</b>	<b>PROPRIETARY RIGHTS</b>
	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 820 Copyrights
	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 720 Labor/Management Relations	<input type="checkbox"/> 830 Patent
	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application
	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 840 Trademark
		<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016
		<input type="checkbox"/> 791 Employee Retirement Income Security Act	
	<b>PRIVACY RIGHTS</b>	<b>IMMIGRATION</b>	<b>SOCIAL SECURITY</b>
<input type="checkbox"/> 210 Land Condemnation	<input checked="" type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment		<input type="checkbox"/> 863 DIWC/DIWW (405(g))
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations		<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment		<input type="checkbox"/> 865 RSI (405(g))
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other		
	<input type="checkbox"/> 448 Education		
	<b>Habeas Corpus:</b>		
	<input type="checkbox"/> 463 Alien Detainee		
	<input type="checkbox"/> 510 Motions to Vacate Sentence		
	<input type="checkbox"/> 530 General		
	<input type="checkbox"/> 535 Death Penalty		
	<b>Other:</b>		
	<input type="checkbox"/> 540 Mandamus & Other		
	<input type="checkbox"/> 550 Civil Rights		
	<input type="checkbox"/> 555 Prison Condition		
	<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

**V. ORIGIN** (Place an "X" in One Box Only) 1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstate or Reopened 5 Transferred from Another District (specify) 6 Multidistrict Litigation - Transfer 8 Multidistrict Litigation - Direct File

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

42 U.S.C § 1983

Brief description of cause:

FALSE ARREST, ILLEGAL DETENTION

**VI. CAUSE OF ACTION** CHECK IF THIS IS A CLASS ACTION  
UNDER RULE 23, F.R.Cv.P.**DEMAND \$**

5,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND:  Yes  No**VII. REQUESTED IN COMPLAINT:**

DEMAND \$

5,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND:  Yes  No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

02/23/2021

SIGNATURE OF ATTORNEY OF RECORD

PROSE NAWROT

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

UNITED STATES DISTRICT COURT

for the

Northern District of Texas



Fort Worth Division

NAKISHA JACKSON

) Case No.

4-21 CV-187-0

(to be filled in by the Clerk's Office)

*Plaintiff(s)*

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

TARRANT COUNTY CORRECTIONS CENTER  
CITY OF ARLINGTON JAIL  
ARLINGTON POLICE DEPT

*Defendant(s)*

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

**COMPLAINT FOR VIOLATION OF CIVIL RIGHTS**  
(Non-Prisoner Complaint)

**NOTICE**

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	NAKISHA JACKSON		
Address	PO BOX 202967		
	ARLINGTON	TX	76006
County	<i>City</i>	<i>State</i>	<i>Zip Code</i>
Telephone Number	TARRANT		
E-Mail Address	817-240-1571		

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name	TARRANT COUNTY CORRECTIONS CENTER		
Job or Title ( <i>if known</i> )			
Address	100 N. Lamar St.		
County	FORT WORTH	TX	76196
Telephone Number	<i>City</i>	<i>State</i>	<i>Zip Code</i>
E-Mail Address ( <i>if known</i> )	817-884-1195		
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

**Defendant No. 2**

Name	CITY OF ARLINGTON JAIL		
Job or Title ( <i>if known</i> )			
Address	620 West Division St		
County	ARLINGTON	TX	76011
Telephone Number	<i>City</i>	<i>State</i>	<i>Zip Code</i>
E-Mail Address ( <i>if known</i> )	TARRANT		
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

## Defendant No. 3

Name	ARLINGTON POLICE DEPT		
Job or Title ( <i>if known</i> )			
Address			
County	620 West Division St	TX	76011
Telephone Number	<i>City</i>	<i>State</i>	<i>Zip Code</i>
E-Mail Address ( <i>if known</i> )	TARRANT		
	(817) 459-5700		

Individual capacity     Official capacity

## Defendant No. 4

Name			
Job or Title ( <i>if known</i> )			
Address	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address ( <i>if known</i> )			

Individual capacity     Official capacity

**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

Federal officials (a *Bivens* claim)  
 State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?  
 First amendment-right to free speech and governmental redress of grievances;  
 Fourth Amendment- NO warrants and arrested without probable cause;  
 Fourteenth Amendment-no due process, delayed arraignment with awareness of fraud, illegal detainment, denied release after bail, delayed cell assignment to prevent me speaking to my counselC. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

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n/a

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- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

SEE ATTACHED DOCUMENT LABELED SECTION II D

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**III. Statement of Claim**

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Arlington and Fort Worth TX

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- B. What date and approximate time did the events giving rise to your claim(s) occur?

August 26-Sept 1, 2020

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- C. What are the facts underlying your claim(s)? (*For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)

I was falsely accused of harassment in a Louisiana state court which lacked jurisdiction. There was no violation, there was no legal judgment, and no probable cause to arrest me. There was no due diligence by Texas authorities to validate the claims prior to engaging.

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**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

I was subjected to 2 jails in the middle of a respiratory pandemic where there was no distancing and masks were not on all inmates at the city facility. I was a free person and was subjected unnecessarily. Texas had the legal obligation to release me no matter what Louisiana said.

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**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I am requesting all identifying information including but not limited to my name, address, and mugshots be scrubbed from the Tarrant County and Arlington jail systems, as they have no right to my information. I am also requesting money damages in the amount of 5 million dollars for liability incurred personally and on my business, including damage to professional standing, lost wages, and attorney fees for 3 different attorneys, due to the state of Texas giving jurisdiction to the State of Louisiana unlawfully, risking my health and safety in a pandemic to assist in covering a crime, and continuing to violate my civil rights on Texas' own accord. Louisiana is NOT Texas.

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**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 02/23/2021

Signature of Plaintiff



Printed Name of Plaintiff

NAKISHA JACKSON

**B. For Attorneys**

Date of signing:

Signature of Attorney



Printed Name of Attorney



Bar Number



Name of Law Firm



Address



City

State

Zip Code

Telephone Number



E-mail Address



Jackson vs TCCC, Arlington City Jail, Arlington Police Dept.

**SECTION II D CONTINUED:**

**Arlington Police Dept—unknown officers**

1. Entered private property with no search warrant for the building and no arrest warrant for me.
2. They illegally searched a private building for me because my new office location was not published.
3. Expressed that they were there only to give the federal agent jurisdiction, there were no Texas charges.
4. The federal agent had no warrant and was in the building >30 mins without a warrant and Arlington PD was aware.
5. They tried to arrest me without it, and then I called the clerk of court in Shreveport to verify the warrant verbally because the police did not volunteer to leave, knowing they did not have a warrant. I still never saw it. I went to avoid further disruption at my place of business and the return of the police with a vengeance.
6. I was falsely arrested August 26, 2020, around 11:30 am in Arlington, TX in front of my staff and business partners.

**Arlington city jail**

1. Once at the jail there was no information on the warrant or in the system about me having a violation
2. I told the intake clerk, with the arresting federal agent present, the warrant was not legal, Louisiana had no jurisdiction, this case was already in the Supreme Court of the United States, and the federal agent arresting me had prior knowledge of that.
3. Bond was set at \$5,000, bail was posted 3 times, in time for each arraignment after my noon arrival, and I was not released.
4. I was held in general holding with people without a mask for almost 12 hrs, unnecessarily. Then kept overnight.
5. My arraignment kept being delayed. Once arraigned at 9 am, the morning of August 27, 2020, I signed a bond order in, an in-person arraignment for \$5,000, posted bail again within 30 mins after, and was not released.
6. Right Before transfer to county on Aug 27, 2020, around noon, a guard told me the bail notice had not been faxed to them. I had notified the bondsmen right after arraignment around 9:30-10:00 and was told it had been faxed, multiple times.

**Jackson vs TCCC, Arlington City Jail, Arlington Police Dept.**

**SECTION II D CONTINUED:**

**Judge Cooper**

1. My arraignment was delayed on Aug 26, 2020, but the guard was confused because I sat there all day, they were not busy, and it was 9 pm. So, he took me to the video arraignment with Judge Cooper.
2. Judge Cooper proceeds to tell the guard I am not on the list to be arraigned by her because she had an "email" stating that a fugitive charge was being added. I had not committed any crimes.
3. I asked her to speak to my lawyer, and she ordered that I be returned to my cell.
4. The next morning I was arraigned by a different Judge in Arlington City Jail, and there was no fugitive charge.

**Tarrant County Corrections Center**

1. I was booked by 2 pm, Thursday Aug 27, 2020, and around 2:30-3 pm my attorney came to see me and was turned away because I did not have a "cell assignment."
2. I was given notice that I would be on the 10:15pm arraignment because the guard saw I had posted bail 5 times, but she said she did not know what was going on.
3. The guard later notified me that I was not getting arraigned that night, and I was to dress out. I was brought to a cell at 3 am. Friday Aug 28, 2020. Later, I became aware that cell was available by 12 noon the day before. I was held in general holding with anywhere from 10-20 other people, for approximately 15 hrs, in close proximity, in the middle of a pandemic, as a free person with Tarrant's awareness that I bailed out 5 times.
4. I had no personal access to the phones for 6 days. I had to ask other inmates to use their IDs to call out. I explained to more than one guard that the phone identification system was not recognizing my name or my number, and I could not call out. Nothing was done.
5. I was held in Tarrant County Corrections Center for 5 nights as a free person, with falsified fugitive charges.

**Tarrant County Clerk and Tarrant County Corrections Center**

1. Mishandled the bail procedure and money- not properly posting it to allow me to bail out; accepting it on the bondsman's end but declining it internally.
2. Conspired with a judge by email to add a fraudulent fugitive charge to illegally detain me.

  
02/23/2021

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